

PROJECT MANAGEMENT PLAN

RECOVERY ACT – Energy Assurance Planning – State of NORTH DAKOTA

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WORK PERFORMED UNDER AGREEMENT

DE-OE0000112

SUBMITTED BY

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EXECUTIVE SUMMARY

The Project Management Plan detailed below will guide North Dakota's Energy Assurance Planning and training effort as specified in Funding Opportunity Number DOE-FOA-000091, Recovery Act – Enhancing State Government Energy Assurance Capabilities and Planning for Smart Grid Resiliency. The Plan includes an overview of the required tasks detailed in DOE-FOA-000091. It is understood by the U.S. Department of Energy to be a “living” document, subject to updates and revisions as the work progresses. North Dakota fully expects that there will be changes within this Project Management Plan as lessons-learned are applied to subsequent tasks.

Background:

The goal of the National Infrastructure Protection Plan (NIPP) is to:

Build a safer, more secure, and more resilient America by enhancing protection of the Nation's critical infrastructure and key resources (CIKR) to prevent, deter, neutralize, or mitigate the effects of deliberate efforts by terrorists to destroy, incapacitate, or exploit them; and to strengthen national preparedness, timely response, and rapid recovery in the event of an attack, natural disaster, or other emergency.

Within the NIPP and Energy Sector Specific Plan, states, local and tribal governments as well as public and private CIKR entities play a key role in ensuring the protection of these resources in an emergency.

Because no current plan exists for ensuring energy resources in an emergency either in the State Energy plan or the State Emergency Operations Plan, it is imperative that North Dakota develop an energy assurance plan to be compliant with NIPP as well as for its own interests. The Department of Energy has asked states to include data and major and alternative energy sources as a foundation for energy assurance planning. DOE has also asked states to consider the potential impact of the Internet, computer-dependant energy controls (e.g., SCADA controls) and related cyber protection protocols that can affect the continuity of energy delivery. Further, North Dakota recognizes the potential role of energy alternatives (such as Smart Grid technology, biofuels, combined heat and power, wind and solar power) for reducing the state's vulnerability during energy shortages and enhancing the state's energy use resiliency.

Proposal: The North Dakota State Energy Office is proposing a project to develop, test and finalize an energy assurance plan that meets the goals listed below. This project would be funded as part of award number DE-OE0000112. Final submission of the Energy Assurance plan would take place no later than April 2012 and be reviewed annually thereafter.

Objective: Develop, test and finalize an energy assurance plan that meets the need of the state in an energy emergency as well as delivers on its requirements to support NIPP. It should be developed in conjunction with key state, local, private and public entities and cover all key energy infrastructure threats such as; deliberate, accidental, natural and systemic. This plan should focus on information sharing and communication between all applicable parties. Finally, the North Dakota Energy Assurance plan should be tested at the state and inter-state levels before inclusion into the State Emergency Operations and State Energy Plans (ESF -12 Energy Annex).

Goals: The goals of this project are:

- 1) Develop, test and finalize an energy assurance plan for the State of North Dakota that details the processes and procedures for state, local and/or tribal entities during an energy assurance event. This plan is to be initially submitted no later than February 13, 2011 with the final tested version submitted no later than April 13, 2012. Key items that must be addressed within the plan:
 - a. Procedures for collecting assessing and providing information on energy supply, demand and market impacts to appropriate state officials.
 - b. Procedures for ensuring energy supply during emergencies disasters and catastrophic events.
 - c. Procedures to ensure cyber security measures are in place to resist attacks on the system as well as through the system.
 - d. Protocols for tracking the duration, response, restoration and recovery time of energy supply events resulting in an energy disruption.
 - e. Procedures for interfacing with local emergency management organizations to include initial assessments of damages, expected duration of outages and impacts on customers.
 - f. Protocols for interfacing with the State Emergency Operations Center to include initial assessments of damages, expected duration of outages and impacts on customers.
 - g. Protocols for restoration of services.
 - h. Protocols for conducting damage assessment and reporting data to city, county and state emergency operations organizations.
 - i. Procedures for ensuring interface with city/county/tribal/state Joint Information Centers to ensure a ‘one voice, many messages’ concept.
 - j. Protocols for conduction after action reports within the company and with local and state emergency operations organizations.
- 2) Establish robust situation awareness within the North Dakota and inter-state regional energy sector through timely, reliable and secure information exchange among trusted private and public security partners. This awareness will be evaluated throughout the project as well as during the intra and inter-state exercises described below.
- 3) Train and develop energy assurance expertise within key departments, specifically, the State Energy Office, the Public Service Commission and North Dakota Department of Emergency Services. The intent is to develop redundancy within all three departments as well as within key private infrastructure companies. This training will take place prior to the intra (NLT August 2011) and inter-state (NLT February 2012) energy assurance exercises. Follow-on training will be conducted as needed.
- 4) Conduct comprehensive intra and inter-state energy assurance exercises that evaluate state and local government energy assurance planning and resiliency efforts by incorporating response actions for energy and Smart Grid applications.

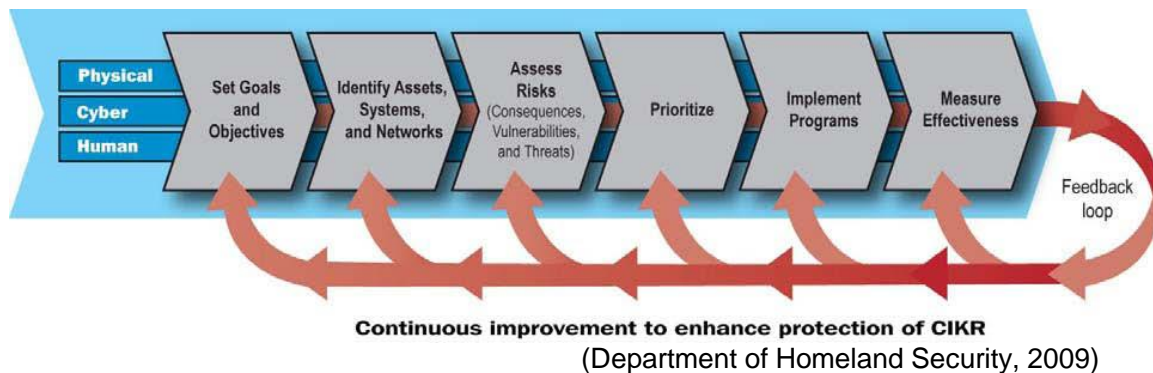
Expected Result:

The expected result is the development of a tested energy assurance plan that meets the goals listed above.

RISK MANAGEMENT

The risk management framework within NIPP and modified within the Sector Specific Plans (SSP) also serves as an appropriate model for managing risk while developing the State Energy Assurance Plan.

Risk Management Framework



Initial Risk Assessment

Risk	Risk Level L/M/H	Likelihood of Event	Mitigation Strategy
Project Size			
Estimated Project Schedule	H: Over 12 months	Certainty	Created comprehensive project timeline with frequent baseline reviews
Team Size at Peak	H: Over 15 members	Certainty	Comprehensive communications plan, frequent meetings, tight project management oversight
Number of Interfaces to Existing Systems Affected	H: Over 3	Certainty	Develop interface control document immediately
Project Definition			
Narrow Knowledge Level of Users	M: Knowledgeable of user area only	Likely	
Available documentation clouds establishment of baseline	M: More than 75% complete/current	Likely	Balance of information to be gathered by consultant
Project Scope Creep	L: Scope specifically defined, subject to revision	Unlikely	Scope initially defined in project plan, reviewed monthly to prevent undetected scope creep
Consultant Project Deliverables unclear	L: Well defined	Unlikely	Included in project plan, subject to amendment
Cost Estimates Unrealistic	L: Well defined	Unlikely	Included in project plan, subject to amendment as new details regarding project scope are revealed

Risk	Risk Level L/M/H	Likelihood of Event	Mitigation Strategy
Timeline Estimates Unrealistic	M: Timeline assumes no derailment	Somewhat likely	Timeline reviewed monthly to prevent undetected timeline departures
Number of Team Members Unknowledgeable of Business	M: Team moderately versed in business operations impacted by technology	Somewhat likely	Project Manager and consultant to identify knowledge gaps and provide training, as necessary
Project Leadership			
Steering Committee existence	L: Identified and enthusiastic	Unlikely	Frequently seek feedback to ensure continued support
Absence of Commitment Level/Attitude of Management	L: Understands value & supports project	Unlikely	Frequently seek feedback to ensure continued support
Absence of Commitment Level/Attitude of Users	L: Understands value & supports project	Unlikely	Frequently seek feedback to ensure continued support
Absence of Mid-Management Commitment	L: Most understand value & support project	Unlikely	Frequently seek feedback to ensure continued support
Project Staffing			
Availability of qualified consultant	M: Have had interest – budget may be an issue.	Somewhat likely	Communicate within industry contacts – may have ability to supplement funding with SEO funds.
Project Team Availability	M: Distributed team makes availability questionable	Somewhat likely	Continuous review of project momentum by all levels. Consultant to identify any impacts caused by unavailability. If necessary, increase commitment by participants to full time status
Physical Location of Team prevents effective management	M: Team is dispersed among several sites	Likely	Use of email and regular update meetings.
Project Team's Shared Work Experience creates poor working relationship	M: Some have worked together before	Somewhat likely	Use of email and regular update meetings.
Project Management			
Procurement Methodology Used foreign to team	L: Procurement Methodology familiar to team	Unlikely	N/A
Change Management Procedures undefined	L: Well-defined	Unlikely	N/A
Quality Management Procedures unclear	L: Well-defined and accepted	Unlikely	N/A

MILESTONE LOG

Figure 1 contains a detailed timeline for the project tasks to include the milestones listed below. Detailed descriptions of each task follow the chart. For the purposes of this plan, the State Energy Office is defined as the applicable Department of Commerce, Community Services Division personnel.

<u>Milestone</u>	<u>Planned Date</u>	<u>Verification Method</u>
Submit Initial PMP	10/12/09	Inspection
Submit Workforce Development plan	11/12/09	Inspection
Submit Energy Supply Disruption Tracking Process	8/13/10	Inspection
Submit Energy Assurance plan	2/13/11	Inspection/Analysis
Intra State Assurance Exercise	8/13/11	Demonstration/Testing
Inter State Exercise After Action Report	9/13/11	Inspection
Inter State Assurance Exercise	2/13/12	Demonstration/Testing
Inter State Exercise After Action Report	3/13/12	Inspection

Task 1- Project Management Plan

Task 1 covers the initial planning and provides an overall timeline and framework for completion of the project. All Tasks listed herein will be completed within the times established by the DOE. Sufficient time will be allowed for internal review and refinement of applicable deliverables.

As this project moves forward, revisions to the Project Management Plan will be reviewed by a group of representatives from state agencies associated with energy assurance planning, as well as energy suppliers and end users.

Task 2 – Workforce Development Plan

This task will inform the DOE how North Dakota intends to train personnel and increase expertise on energy assurance within the State. The requirements for the Workforce Development Plan (WDP):

- The State Energy Office will prepare a draft WDP for review by a group of planning stakeholders.
- The Principal Investigator writes the WDP.
- The State Energy Office submits the WDP to the DOE.
- The State Energy Office begins the Request for Proposal process to hire a contractor for assistance in developing the plan. These steps are detailed in the timeline above.

Task 3a – Energy Assurance Plan

This central task to the project will form the basis for energy data management, continual stakeholder training, and emergency resource allocation. It will also foster coordination and cooperation between state government and private stakeholders. The major components of this task are:

- Contractor acquires data on-site and via the Internet regarding energy supply and consumption data, infrastructure and alternatives. This step is the development of the state's energy profile information for future analysis within the plan creation. The data obtained will be for all forms of energy used in North Dakota to include petroleum products, natural gas, electricity and alternatives.
- Contractor creates EA plan outline for the State Energy Office. The outline will update the SEO and will conform to the National Association of State Energy Officials – DOE State Energy Assurance Guidelines (NASEO, 2009). Additional sources listed in the resource section will also provide guidance on the plan development.
- The State Energy Office reviews outline.
- State Energy Office and contractor identify key stakeholders for interview.
- Contractor sets up in-state interviews of individuals within state agencies and other organizations and companies.

- Contractor does meeting preparation.
- Contractor/SEO performs on-site stakeholder interviews and visits. These interviews will include the SEO's Energy Assurance designee. This by definition becomes part of the training noted in the WDP. Interview follow-up will be as needed.
- SEO/Contractor review data.
- Contractor analyzes data and evaluates vulnerability & risk factors. Within this analysis will be issues regarding energy use patterns, geographical distinctions, external energy market factors and the impact of electronic factors such as systems controls, cyber security and independent service operator (ISO) connectivity.
- Contractor/SEO review impact of energy alternatives including Smart Grid technology
- Contractor drafts Energy Assurance Plan. The initial plan will include the state energy usage, issues of vulnerability and risk, recommendations for data acquisition and identification of impending energy problems. This task will include the process for acquiring, updating and using energy data.

The role of key stakeholders will be examined, specifically, with emphasis on how public and private sectors work with issues under their jurisdiction. Examples include utility regulation and energy assurance management. The role of local jurisdictions and industry councils will also be included. This will include alternatives energies; wind, solar, efficiency and Smart Grid.

The plan will also include a list of mitigation strategies or measures North Dakota may take. This will range from public communication to more regulated activities. Public communication should be a focus item. Additionally, emphasis will be placed on averting the use of these mitigation measures by instituting preemptive efforts at the first sign of a potential shortage or disruption.

- Review of plan and edits.
- Update plan with edits and submit to SEO.

Task 3b – Energy Assurance Plan – Internal Stakeholder Review

- SEO/Contractor briefs state agencies and key stakeholders on Plan and elicits feedback.
- Contractor begins review of draft Plan.
- Suggestions from reviews are evaluated and incorporated, as appropriate, into the EA Plan.
- SEO reviews the final edited Plan draft.
- Contractor completes final edits and formatting.
- SEO submits North Dakota State Energy Assurance Plan to DOE.

Task 4 – Develop Energy Supply Disruption Tracking Process

This task will be completed in parallel with Task 3. The first portion of the task is creating guidelines for gathering real-time energy data during an emergency. The other is evaluating lessons learned from energy emergency events that affect the State's energy consumption. Obtaining real-time assurance related energy data may be a challenge. Some private sector stakeholders might argue that this data is proprietary and difficult to furnish while an energy emergency is taking place.

As such, in addition to obtaining this data, educating stakeholders of the value of this data and ensuring the confidentiality and integrity of the data is within the scope of this task. This effort will need to be weighed against the cost and effort of obtaining and sharing the data.

The State Energy Office will also work with Departments of Homeland Security and Public Utility Commission to share post event information in a systematic way. Included in this task is the guidance for obtaining, evaluating, and utilizing this information. Key steps within this task:

- Contractor prepares a Tracking Process outline for SEO.
- Contractor/SEO discusses data acquisition issues with various stakeholders.
- Contractor/SEO discusses post-event information retention and evaluation strategies with key stakeholders.
- Contractor develops a workable plan while seeking support from key stakeholders.
- Following an internal edit by SEO, the Contractor will make changes.
- SEO and review group review the proposed Tracking Process.
- Final edits by the SEO and the Contractor.
- SEO submits to DOE.

Task 5a – Intra-State Energy Assurance Exercises

Detailed here are the steps for developing and holding the state exercises that will serve as training for North Dakota energy assurance stakeholders. The training will follow the completion of the North Dakota State Energy Assurance Plan and will accomplish the following:

- Familiarize North Dakota EA stakeholders with the state's Energy Assurance Plan.
- Allow participants to interact and develop informal networking among stakeholders.
- Provide for evaluation of potential energy shortage scenarios.

North Dakota expects feedback and information gleaned from these exercises will drive improvements in policy, planning and future exercises.

This task will be executed in coordination with the Department of Homeland Security and Public Utility Commission among other stakeholders. These may include state and local government agencies, energy consumers, industry organizations, company representatives and interested observers.

The Contractor will develop materials for this Task in coordination with the State Energy Office. After approval of training materials, training will be held. After action reports will be conducted

using the Homeland Security Exercise and Evaluation Program guidelines. Key actions within this Task:

- Identify stakeholders to attend training.
- Draft training materials.
- Organize venue and logistic requirements.
- Review materials and scope of training.
- Hold the exercise.
- Review results and modify plans and future training as needed.

Task 5b – Interstate Energy Assurance Exercises

The final Task will take place with the cooperation and coordination of neighboring states. At the time of the Project Management plan creation, it is assumed that North Dakota will work with its immediate region. The feedback and lessons from the intra-state exercises will guide planning for this Task. The intent is to familiarize state stakeholders with their counterparts in surrounding states as well as to identify and resolve any conflicts and unwanted consequences of actions taken within each jurisdiction. This may include ways to manage regional energy infrastructure, e.g. Independent Service Operator, regional liquids and gas delivery, electric transmission, and gas and liquids storage and transportation. The focus of the training will be on familiarization of a potential energy interruption event that would affect many states simultaneously.

Completion of this Task will require coordination with the Energy Assurance Plans of neighboring states and communication and coordination among energy assurance personnel and stakeholders. Steps include:

- Identify potential interstate participants. The National Association of Energy Officials may be coordinating some exercises, regardless, it is important that work on this begins early within the project to provide the necessary time to develop training options.
- Coordinate with interstate partners and determine methodology and logistics of proposed training events. NASEO may be the lead coordinating body of this sub-task.
- Create and review training materials in conjunction with participants.
- Hold the training exercise.
- Elicit feedback on training event to evaluate results and plan for future exercises.

FUNDING AND COSTING PROFILE

Table 1 –Project Funding Profile

Budget Category	Year 1	Year 2	Year 3	Total
Travel		\$ 5,000	\$ 5,000	\$ 10,000
Contractual	\$ 53,773	\$ 64,527	\$ 32,264	\$ 150,563
Salaried Direct	\$ 11,536	\$ 13,843	\$ 6,921	\$ 32,300
Other (exercise cost)		\$ 35,000	\$ 10,000	\$ 45,000
Total Direct Charges	\$ 65,309	\$ 118,370	\$ 54,185	\$ 237,863
Indirect Charges	\$ 7,498	\$ 8,998	\$ 4,499	\$ 20,995
Total	\$ 72,807	\$ 127,368	\$ 58,683	\$ 258,858

Table 2 – Project Spending Plan

North Dakota Energy Assurance Project Spending Plan	Project Year 1 11/2009 – 10/2010	Project Year 2 11/2010 – 10/2011	Project Year 3 11/2011 – 10/2012	
November	\$1,587	\$7,281	\$7,281	
December	\$1,587	\$7,281	\$7,281	
January	\$6,963	\$7,281	\$7,281	
February	\$6,963	\$7,281	\$22,279	
March	\$6,963	\$7,281	\$7,281	
April	\$6,963	\$7,281	\$7,281	
May	\$6,963	\$7,281		
June	\$6,963	\$17,281		
July	\$6,963	\$22,281		
August	\$6,963	\$22,281		
September	\$6,963	\$7,281		
October	\$6,963	\$7,281		
Total (\$s in thousands)	\$72,807	\$127,368	\$58,684	\$258,858

SUCCESS CRITERIA

The success of this project will be measured against the following criteria:

- 1) A comprehensive and fully tested energy assurance plan is created for the state of North Dakota that meets the goals listed in the Executive Summary.
- 2) Expertise is developed within the state around energy emergency management to include state, county, and city government as well as public and private energy entities. This expertise will be measured via the number of training sessions and/or workshops or exercises conducted as well as the number of people involved in these training activities.

REPORTING

Reporting Dates are provided in Table 3 below

Table 3

Reporting Item	Date
1 st quarterly report: Progress on PMP and WDP	November 11-21, 2009
2 nd quarterly report: Progress on RFP for contractor, other tasks	February 11-21, 2010
3 rd quarterly report: Progress on EA Plan and Tracking Plan	May 11-21, 2010
4 th quarterly report: Progress on EA Plan and Tracking Plan	August 11-21, 2010
5 th quarterly report: Progress on EA Plan	November 11-21, 2010
6 th quarterly report: Progress on Intra-state training	February 11-21, 2011
7 th quarterly report: Progress on Intra-state training	May 11-21, 2011
8 th quarterly report: Progress of Interstate training	August 11-21, 2011
9 th quarterly report: Results of Interstate training	November 11-21, 2011
10 th quarterly report: Post project deliverable progress and further Plan changes	February 11-21, 2012
11 th quarterly report: Post project deliverable progress and further Plan changes	May 11-21, 2012
12 th quarterly report: Final Report	August 11-21, 2012

AGREEMENT STATEMENT OF PROJECT OBJECTIVES

State of North Dakota DE-OE0000112 STATEMENT OF PROJECT OBJECTIVES (SOPO)

A. OBJECTIVES

The objectives of this initiative are to: 1) strengthen and expand State and local government energy assurance planning and resiliency efforts by incorporating response actions for new energy portfolios and Smart Grid applications; 2) create jobs, and 3) build in-house State and local government energy assurance expertise.

The initiative focuses on building regional energy assurance capability to allow the State to better coordinate and communicate state-wide and with one another, on energy security, reliability, and emergency response issues.

B. SCOPE OF WORK

The following activities are addressed under this initiative:

- Create in-house expertise at the State level on energy assurance planning and resiliency, focusing on Smart Grid applications and vulnerabilities, critical infrastructure interdependencies, cyber security, energy supply systems, energy data analysis, and communications.
- Develop new, or refine existing, Energy Assurance Plans to incorporate response actions to new energy portfolios, including Smart Grid technologies.
- Revise appropriate State policies, procedures and practices to reflect the Energy Assurance Plans. States should append the Energy Assurance Plan to the State Energy Plan, as appropriate.
- Development and initiation of a process or mechanism for tracking the duration, response, restoration and recovery time of energy supply disruption events.
- Train appropriate personnel on energy infrastructure and supply systems and the content and execution of energy assurance plans.
- Conduct energy emergency exercises (intra and inter-state) to evaluate the effectiveness of the Energy Assurance Plans.

The results of the funding provided for the projects will be assessed according to the following performance metrics:

- Number of Energy Assurance Plans created or substantially revised
- Number of jobs created within State government agencies for energy assurance planning and response capabilities
- Number of energy assurance training sessions, workshops and/or exercises conducted
- Number of people trained

C. TASKS TO BE PERFORMED

Task 1.0 - Project Management Plan

The Recipient will prepare a Project Management Plan (PMP) in accordance with the provided PMP template that details the work elements required to manage and report on activities in accordance with the American Recovery and Reinvestment Act (ARRA) and grant requirements. This Plan will also document the 3-year plan and project budget for carrying out all Tasks and completing all Deliverables under this Grant. It is anticipated that this document may be periodically revised during the performance period, but will at all times provide sufficient detail to plan, carry out and monitor all project activities.

Task 2.0 – Workforce Development Plan

The Recipient will prepare and follow a Workforce Development Plan that results in development of in-house expertise at the State level on energy assurance planning with an emphasis on Smart Grid applications and vulnerabilities, critical infrastructure interdependencies, cyber security, energy supply systems, energy data analysis, and communications. The Plan will address hiring, retaining, and training personnel in these areas.

Task 3.0 – Energy Assurance Planning

The Recipient will develop a new, or substantially refine its existing, Energy Assurance Plan to incorporate response actions for new energy portfolios, including Smart Grid technologies. The Energy Assurance Plan shall address, at a minimum, Smart Grid applications and vulnerabilities, critical infrastructure interdependencies, cyber security, energy supply systems, energy data analysis, and communications. Through Cooperative Agreement Number DE-FC26-07NT43264, NASEO, with DOE, has prepared the State Energy Assurance Guidelines, which may serve as a model for State Energy Offices in developing or revising the Energy Assurance plans under this initiative. (link: www.naseo.org/eaguidelines) The recipient will revise appropriate State policies, procedures and practices to reflect the State's Energy Assurance Plan. The State will append its Energy Assurance Plan to the State Energy Plan, as appropriate.

Task 4.0 – Energy Supply Disruption Tracking Process

The Recipient will initiate a process or mechanism for tracking the duration, response, restoration and recovery time of energy supply disruption events.

Task 5.0 - Energy Assurance Exercise

The Recipient will develop a strategy to exercise its Energy Assurance Plan, simulating, through table-top exercises, energy emergency/disruptions, both within the state (including municipal and county governments as well as pertinent state agencies such as Public Utility Commissions and Emergency Management Offices) and on a multi-state or regional scale, incorporating local, state and federal agencies and industry as appropriate. The Recipient shall conduct, or participate in at least two exercises as described below

Subtask 5.1 – Conduct at least one intra-State training/exercise that includes players from State agencies, local governments, industry and Federal partners, as appropriate. The

recipient shall prepare an exercise after-action report, which will result in actionable items and any necessary revisions/modifications to the Energy Assurance Plan.

Subtask 5.2 – Participate in and/or conduct at least one inter-State/Regional exercise that includes players from neighboring States, local governments, industry and Federal partners, as appropriate. The recipient shall prepare an exercise after-action report, which will result in actionable items and any necessary revision/modifications to the Energy Assurance Plan.

D. DELIVERABLES

Reports shall be submitted in accordance with the "Federal Assistance Reporting Checklist" and the instructions accompanying the checklist included as Attachment 3 to this agreement. In addition, the following deliverables, as well as the deliverables identified/described in the Project Management Plan, are required:

Deliverable 1.0 – Project Management Plan (Plan due 60 days after the award and revised as necessary throughout the performance period.)

Deliverable 2.0 – Workforce Development Plan (Plan due 90 days after the award and revised periodically if necessary throughout the performance period.)

Deliverable 3.0 – Energy Assurance Plan (The initial Energy Assurance Plan is due 18 months after the award and revised (if necessary) following the energy assurance exercises. A final Energy Assurance Plan shall be delivered at the completion of the performance period.)

Deliverable 4.0 – Documented process or procedure for tracking the duration, response, restoration and recovery time of energy supply disruption events. (Due one year after the award.)

Deliverable 5.0 – Energy Assurance Exercise Summary and After-Action Report(s)

Deliverable 5.1 - The intra-state training/exercise(s) must be completed within 24 months after the award, with an after-action report delivered 30 days following the exercise.

Deliverable 5.2 - The inter-state/regional training/exercise(s) must be completed within 30 months after the award, with an after-action report delivered 30 days following the exercise.

Resources

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